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13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15 IN RE NEW CENTURY

) Consolid. Case No. 2:07-cv-00931-DDP
16) (FMOx)
17)
18) **DISCOVERY MATTER**
19)
20) KPMG LLP'S NOTICE OF MOTION
21) AND MOTION TO COMPEL THE
22) PRODUCTION OF DOCUMENTS
23) FROM LEAD PLAINTIFF NEW YORK
24) STATE TEACHERS' RETIREMENT
25) SYSTEM AND PLAINTIFFS CARL
26) LARSON AND CHARLES HOOTEN
27)
28) Date & Time: October 14, 2009, 10 a.m.
) Dept: F
) Discovery Cut-off: None Set
) Pretrial Conf.: None Set
) Trial Date: None Set

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on October 14, 2009 at 10:00 a.m., or
3 as soon thereafter as the parties may be heard before the Honorable Fernando M.
4 Olguin in Courtroom F of the United States District Court for the Central District of
5 California, located at 312 N. Spring Street, Los Angeles, California 90012, Defendant
6 KPMG LLP ("KPMG") will and hereby does move to compel the production of
7 documents from Lead Plaintiff New York State Teachers' Retirement System and
8 Plaintiffs Carl Larson and Charles Hooten (collectively "Plaintiffs") in the above-
9 captioned action pursuant to Federal Rule of Civil Procedure 26(b)(1) and
10 37(a)(3)(A), and Local Rule 37.

11 This motion is made following the conferences of counsel pursuant to
12 Local Rule 7-3, which took place on June 5, 2009, July 23, 2009, and July 24, 2009.
13 This motion is based on this Notice of Motion, the Joint Stipulation Regarding
14 KPMG's Motion to Compel the Production of Documents from Plaintiffs, the
15 Declaration of Jodi E. Lopez in Support of KPMG's Motion to Compel the Production
16 of Documents, all other pleadings and papers on file in this action, and such other
17 further written and oral argument and authorities as may be presented at or before the
18 hearing on this Motion.

19
20 Dated: September 23, 2009

Respectfully submitted,

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22 KPMG LLP

23 By: Bradley H. Ellis
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25 Bradley H. Ellis
Attorneys For Defendant KPMG LLP